

EPA's Revised Comments

**ASHEVILLE DYEING & FINISHING CO./ANVIL KNITWEAR
NCD 070 619 663**

DRAFT RCRA FACILITY ASSESSMENT

REPORT DATE: JULY 29, 2004

EXECUTIVE SUMMARY

1. The last paragraph in the Executive Summary mentions two Areas of Concern (AOCs) but only one AOC is listed in Table 2. Although this apparent discrepancy is explained in the AOC description (Section 6.24), it is confusing to mention two AOCs in the text but then only list one AOC in Table 2 and on Figure 1.

Table 1 and Table 2

2. Add a column on the right side of Table 1 and Table 2 with a heading of "Recommendation". To designate the recommended actions please use the following abbreviations:
NFA – No Further Action
CS – Confirmatory Sampling
RFI – RCRA Facility Investigation

2.0 INTRODUCTION

3. In Section 2.1, the list of attendees should also include Chris Binnicker, Vice President of Textiles for Anvil Knitwear.

3.0 FACILITY DESCRIPTION

4. The correct EPA ID number for this facility is NCD070619663.

4.0 DESCRIPTION OF SITE ACTIVITIES AND HISTORY

5. Insert a double space above this heading.

4.1 Waste Management Practices

6. "Ashville" is misspelled in the first paragraph.

4.2 Regulatory History

7. In paragraph 3, second sentence, replace the word "dumped" with "disposed". Add the following sentence:
"At the time of the VSI all drums inspected appeared to be empty."

5.1.2 Topography and Surface Water

8. "Swananoa River" in the first paragraph is misspelled. Also, please define the C stream classification.

6.0 SWMU AND AOC DESCRIPTIONS

9. The first paragraph refers to two AOCs. Please see Comment 1 above.

6.13 SWMU 13 – Eight-Inch Drain

10. The first sentence in the “History and/or Evidence of Release” section states that a spill of primarily PCE occurred in “approximately 1971”. The second sentence refers to the August 14, 1976 cleanup of the impacted area. Was this release in 1971 or is it the August 12, 1976 release?

6.14 SWMU 14 – Old Dump Area

11. The second sentence in the “Physical Description and Condition” section, replace the word “dumped” with “disposed”. Add the following sentence:
“At the time of the VSI all drums inspected appeared to be empty.”
12. Change the recommendation from RFI to Confirmatory Sampling. Also show this change in the Comments section.

6.24 AOC 1 – Former Disturbed Soil Area

13. Since additional investigation is recommended for areas A and B and they are in close proximity to each other, it makes sense logistically to group these two areas into one unit. Therefore, it is recommended that there be a reference to only one AOC in the text instead of two AOCs.
14. Change the recommendation from RFI to Confirmatory Sampling.